

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>PDG PRESTIGE, INC.,</b>	§	<b>Case No. 21-30107</b>
	§	
<b>Debtor.</b>	§	

---

**AMENDED WITNESS AND EXHIBIT LIST OF LEGALIST DIP GP, LLC  
ON BEHALF OF LEGALIST DIP FUND I, LP AND LEGALIST DIP SPV II, LP**

**TO THE HONORABLE H. CHRISTOPHER MOTT,  
UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW, Legalist DIP GP, LLC, on behalf of Legalist DIP Fund I, LP and Legalist DIP SPV II, LP (“Legalist”) and files this Amended Witness and Exhibit List in connection with the hearing on the Motion of Legalist DIP GP, LLC to Compel Michael J. Dixon to Testify at Oral Deposition and Produce Documents Pursuant to Fed. R. Bankr. P. 2004 (Doc. #221), to be held in the above-referenced matter, set for **Wednesday, April 19 at 1:30 p.m. (MT)** (the “Hearing”).

Legalist respectfully represents as follows:

**Witnesses**

Legalist hereby designates the following as persons who may be called to testify as witnesses at the Hearing:

1. Chris Wren;
2. Michael Dixon;
3. Any witness designated by any other party; and
4. Any person necessary for impeachment or rebuttal.

### Exhibits

Legalist hereby designates the following documents, either the originals or true and correct copies of the originals, as documents it may introduce at the Hearing:

No.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition
1.	November 29, 2022 email from process server to N. Summerville [Doc. 221 found at p. 8 of 27]						
2.	December 21, 2022 email from J. Carruth to G. Walraven [Doc. 221 found at p. 10 of 27]						
3.	December 22, 2022 Subpoena and Notice of 2004 Examination to M. Dixon [Doc. 221 found at p. 12 of 27]						
4.	January 4, 2023 email from G. Walraven to J. Carruth [Doc. 221 found at p. 27 of 27]						
5.	Stipulation Regarding Adjournment of Foreclosure Sale [Doc. 385 in Case No. 21-30071]						
6.	Second Amended Plan of Reorganization of PDG Prestige, Inc. [Doc. 145]						
7.	Debtor-In-Possession Term Loan Credit Agreement [Doc. 24 found at p. 8 of 39]						
8.	Documents produced by M. Dixon on January 28, 2023						
9.	ALTA Seller's Settlement Statement [Doc. 240 found at p. 13 of 18]						
10.	Chase Statement 1292-1295						
11.	Chase Statement 1303-1308						
12.	Declaration of Melinda K. Cazee						
13.	Final Order Granting Motion of Debtor to (I) Enter Into Debtor Possession Credit Agreement, (II) Grant Priming Liens Under code. Sec. 364(d), and (III) Provide Related Relief [Doc. 43]						

14	First Amended Disclosure Statement (as Corrected) in Support of First Amended Plan of Reorganization of PDG Prestige Inc. dated January 17, 2022 [Doc. 116]						
15	First Supplement to Chapter 11 Plan and Disclosure Statement Regarding Retained Claims and Causes of Action [Doc. 126]						
16.	Any exhibit designated or introduced by any other party.						
17.	Rebuttal or impeachment exhibits as necessary.						

Legalist expressly reserves the right to amend and add additional witnesses and exhibits, including rebuttal witnesses and exhibits, as they are determined to be relevant or helpful by the Court.

**Dated: April 14, 2023.**

Respectfully submitted,

**BELL NUNNALLY & MARTIN, LLP**

/s/ Russell W. Mills  
 Russell W. Mills  
 Texas State Bar No. 00784609  
 rmills@bellnunnally.com  
 Gwen I. Walraven  
 Texas State Bar No. 24047065  
 gwalrwaven@bellnunnally.com  
 2323 Ross Avenue, Suite 1900  
 Dallas, Texas 75201  
 214.740.1400 (Telephone)  
 214.740.1499 (Facsimile)

**ATTORNEYS FOR  
 LEGALIST DIP GP, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the *Amended Witness and Exhibit List* was served on all parties on this 14th day of April 2023, via *CM/ECF* and/or by First Class Regular Mail.

/s/ Russell W. Mills  
 Russell W. Mills